

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:25-cv-20858-RAR**

**HERIBERTO VALIENTE,**

Plaintiff,

v.

**BAPTIST HEALTH SOUTH FLORIDA,  
INC., and PALM BEACH CREDIT  
ADJUSTORS, INC. d/b/a KENDALL  
CREDIT AND BUSINESS SERVICE,  
INC.,**

Defendants.

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**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
RESPONDED TO DEFENDANT’S MOTION TO DISMISS AMENDED COMPLAINT**

Plaintiff Heriberto Valiente (“Plaintiff”), by and through the undersigned counsel, and pursuant to Fed. R. Civ. P. 6(b)(1)(A), files this Motion for Extension of Time to file a Response to Defendants’ Motion to Dismiss Amended Complaint, and states as follows:

1. On April 23, 2025, Defendants filed a Motion to Dismiss Plaintiff’s Amended Complaint (“Defendants’ Motion”). [D.E. 16]
  2. The current deadline in which to respond to Defendants’ Motion is May 7, 2025.
  3. Based on the needs of this case and the arguments raised within Defendants’ Motion, Plaintiff respectfully requests a two (2) week extension of time in which to respond to Defendants’ Motion.
  4. The new deadline in which to file a response to Defendants’ Motion will be May 21, 2025.
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5. The instant motion is filed in good faith and is not filed for the purposes of delay.

6. Pursuant to Local Rule 7.1 (a)(2), a proposed Order is attached for the Court's convenience as Exhibit "A" and a copy will be transmitted in Microsoft Word format via electronic mail to ruiz@flsd.uscourts.gov, pursuant to the Administrative Procedures of the Southern District of Florida.

Dated: April 29, 2025

Respectfully Submitted,

/s/ Thomas J. Patti

**THOMAS J. PATTI, ESQ.**

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*COUNSEL FOR PLAINTIFF*

**LOCAL RULE 7.1(a)(3) CERTIFICATION**

Plaintiff certifies that Plaintiff has conferred with Defendants' counsel, who does not oppose the relief requested.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on April 29, 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Thomas J. Patti

Florida Bar No.: 118377